

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING)	
PHARMACY, INC. PRODUCTS LIABILITY)	MDL No. 02419
LITIGATION)	Docket No. 1:13-md-2419-RWZ
_____)	
)	
This document relates to:)	
)	
All Cases)	
)	

**BOX HILL DEFENDANTS' MOTION IN OPPOSITION TO THE U.S. ATTORNEY'S
MOTION TO STAY THE DEPOSITION OF JOSEPH CONNOLLY**

The Box Hill Defendants¹ hereby respond to the United States Attorney's recent Motion to stay the deposition of Joseph Connolly, scheduled for tomorrow, November 11, 2015 at 9:00 a.m. in Boston. Like many others, this office made travel arrangements to arrive in Boston early tomorrow morning (November 11th) for the deposition of Mr. Connolly, based on the Notice of Deposition filed and the fact that no opposition had been filed as of yesterday morning. The U.S. Attorney's Office did not file a Motion to Stay until about 6:45 p.m. last night after arrangements had already been made. Changing or canceling those reservations and plans at this point will create a significant inconvenience and cost. It is respectfully requested, therefore, that the deposition of Joseph Connolly not be stayed, but instead proceed tomorrow as previously scheduled to avoid delay and expense.

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¹ Box Hill Surgery Center, LLC; Ritu T. Bhambhani, M.D.; and Ritu T. Bhambhani, M.D., LLC

Dated: November 10, 2015

Respectfully submitted,

/s/ Gregory K. Kirby

Gregory K. Kirby

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 10th day of November, 2015.

/s/ Gregory K. Kirby

Gregory K. Kirby